

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

TRACY DEBOSE LAMPKIN,

Plaintiff

v.

UNITED PARCEL SERVICE, INC,

Defendant.

CIVIL ACTION NO.
1:06-CV-538-WKW

DECLARATION OF RYAN BROWN

I, Ryan Brown, pursuant to 28 U.S.C. § 1746, hereby affirm that I am over 18 years of age and am competent to make the following Declaration:

1.

I am employed by UPS as a package car driver in the Alabama District. I previously worked for UPS at its Dothan, Alabama Center as a part-time supervisor. I was promoted to part-time supervisor from an hourly position at the Dothan Center in August, 2003.

2.

Initially, I worked on the a.m. shift as a part-time supervisor. At that point, there were only two part-time supervisors working the a.m. shift. Sometime around early 2004, I was switched to the p.m. shift as a part-time supervisor and, at that time, I commenced working with Ms. Lampkin. This change did not create a part-time supervisor vacancy on the a.m. shift where I formerly worked. Instead, the full-time supervisor who had been working on the p.m. shift moved to the a.m. shift. These were the only movements of supervisory personnel at that time.

3.

At the beginning of June, 2006, I moved from part-time supervisor to my current position as a package car driver. In order to make this move, I was required to submit a letter of interest to the Alabama district's Human Resource department advising them that I wanted to be considered for a package car driver position. It was a longstanding practice to submit this letter of interest to be considered for the job, and I submitted such a letter before I was transferred to my position as a driver.

I declare under penalty of perjury that the foregoing is true and correct.



Ryan Brown

Executed on this 22 day of December, 2007.